

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability  
Litigation,

No. 2:15-MD-02641-DGC

**JOINT [PROPOSED] CASE  
MANAGEMENT ORDER NO. 4**

**(Waiver of Service Provisions for Bard  
Defendants)**

With the substantial agreement of the parties, the court hereby ORDERS that:

1. Subject to the conditions set forth in this Order, Defendant C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard") will waive service of process in cases filed in this court in which they are named and one or more IVC filter products either manufactured or distributed by Bard is alleged to be at issue.

2. For such cases, plaintiffs shall send the short form complaint and a request for waiver of service pursuant to the provisions of Fed. R. Civ. P. 4 to Richard B. North, Jr. by email jointly to [richard.north@nelsonmullins.com](mailto:richard.north@nelsonmullins.com); [maria.turner@nelsonmullins.com](mailto:maria.turner@nelsonmullins.com); and [matthew.lerner@nelsonmullins.com](mailto:matthew.lerner@nelsonmullins.com).

3. Counsel for Bard shall return the signed waiver requests to the court within the time permitted by Fed. R. Civ. P. 4.

4. Plaintiffs submitting a request for waiver shall not seek to hold Bard in default for failure to timely answer or otherwise respond to a complaint in which service has been accomplished pursuant to the terms of this Order without first giving Bard

1 written notice of the alleged default and ten business days in which to cure any alleged  
2 default.

3 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_.

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6 David G. Campbell  
7 United States District Judge  
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